



Privacy Strategy

Purpose

1. The purpose of this Strategy is to improve Kāinga Ora's privacy maturity, both in terms of baseline capabilities, and its ability to fully comply with the new Privacy Act 2020. The Strategy should be read alongside our Privacy Roadmap, which specifies the key tasks to be undertaken, and indicative timeframes for their completion.

Commitment to privacy

2. Like many agencies, Kāinga Ora collects a significant amount of personal information via a range of channels. We take the security of our customers' information seriously and are committed to ensuring that we have the right systems in place to manage that information in accordance with best practice across government.
3. We are a large organisation with a strong regional presence and our customers often have complex needs. Our privacy programme will, therefore, involve ensuring that there is consistency in our approach to privacy across all of our offices and our various business units and that extra care is taken with sensitive information.
4. As one of the country's largest landlords, the personal information that we hold is mainly tenancy-related, but it also includes information related to wrap-around services. We have many long-term tenants and so collect a lot of information over time.

Privacy by design

5. While Kāinga Ora has not experienced many privacy incidents to date, there is an opportunity with the establishment of the new organisation in October 2019 to ensure that privacy practices are in good shape across the organisation. All of our new initiatives are directed at fostering a culture of "privacy by design."
6. Our aim is to ensure that Kāinga Ora staff feel confident that they are handling personal information as they should and that the organisation as a whole treats personal information in accordance with the information privacy principles in the Privacy Act and principles of Te Ao Māori.

Privacy Maturity Assessment Framework

7. We intend to use the Government Chief Privacy Officer's (GCPO's) Privacy Maturity Assessment Framework (PMAF) as a framework for measuring our progress in meeting core expectations, as well as the new legislative requirements.
8. Our Privacy Roadmap details the steps we will take to improve our performance against each of the PMAF indicators. Some of these activities are already occurring, but we consider that many of them should be undertaken on a more systematic basis.
9. We expect that there will be "quick wins", longer term goals, and ongoing work in certain areas (for example, staff training will need to occur on an regular basis). The Roadmap prioritises the various initiatives to help us work towards best practice over a four year period.



10. Our four focus areas are: ensuring that we have the right governance structures in place for day-to-day compliance monitoring; delivering staff training; developing policies and other guidance material; and preparing for the new mandatory breach notification regime.
11. With regard to governance, we intend to establish a new committee bringing together representatives of various relevant business units on a regular basis, so that any privacy issues arising or proposed improvements can be considered in a timely manner.
12. We propose to offer staff training via a range of mediums and at a range of levels, from basic through to more advanced. Up-to-date training would be built into induction processes and also made available on a regular basis through a range of mediums as a refresher.
13. We intend to develop a new organisation-wide privacy policy and supporting guidance materials that staff can easily access via a dedicated intranet page. This may be accompanied by a dedicated email address that staff can use to ask questions, raise issues and make suggestions.
14. A key aspect of the privacy programme will be in ensuring that the right systems and processes are in place so that we can respond quickly to any privacy breaches. This will mean ongoing collaboration between various teams including legal, business assurance, information security and records management.